Form ADV Part 2A Investment Adviser Brochure

109 Fairhaven Road, Suite F Mattapoisett, MA 02739 (508) 758-6159 www.seamarkfinancial.com

March 2023

This Brochure provides information about the qualifications and business practices of Seamark Financial Services, Inc. ("we", "us", "our"). If you have any questions about the contents of this Brochure, please contact Lynne T. Nahigyan, Vice President and Chief Compliance Officer at (508) 758-6159 or lynne@seamarkfinancial.com.

Additional information about our Firm is also available on the SEC's website at www.adviserinfo.sec.gov. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary of Material Changes

Annual Update

In this Item of Seamark Financial Services, Inc.'s (or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 7, 2022.

Material Changes since the Last Update

Since the last ADV Annual Amendment filing, we have the following Material Changes to report:

- This Form was updated to include information regarding our fiduciary role when providing services to retirement investors and retirement accounts. Please see Item 4: Advisory Business for more information.
- This Form was updated to include disclosure of our conflict of interest related to the financial incentive we have in recommending the transfer of retirement plan assets to accounts that we manage. Please see Item 5: Fees and Compensation for more information.

Full Brochure Available

Seamark Financial Services' Form ADV may be requested at any time, without charge by contacting Lynne T. Nahigyan, Vice President and Chief Compliance Officer at (508) 758-6159 or lynne@seamarkfinancial.com.

Additional information about our Firm is also available on the SEC's website at www.adviserinfo.sec.gov. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

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Item 4: Advisory Business

Firm Description

Seamark Financial Services, Inc. is an Investment Adviser providing advice to individuals, trusts, and estates. Seamark Financial Services, Inc. was founded in 1997.

Principal Owners

Seamark Financial Services, Inc. is owned by R. William Blasdale and Lynne T. Nahigyan.

Wealth Management / Financial Planning

Seamark Financial Services, Inc. provides personalized confidential financial planning and investment management (wealth management) to individuals. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Seamark Financial Services, Inc. is strictly a fee-only financial planning and investment management firm. The Firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The Firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Assets are invested primarily in no-load mutual funds and exchange-traded funds, through a discount broker. Fund companies charge each fund shareholder an operating expense fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Seamark Financial Services, Inc. does not receive any compensation, in any form, from fund companies.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Clients may impose restrictions on investing in certain securities or types of securities.

Fiduciary Statement

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act, ("ERISA") and/or the Internal Revenue Code, ("IRC"), as applicable, which are laws governing retirement accounts.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances, and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have a reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;
- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

Wrap Fee Programs

Seamark Financial Services, Inc. does not participate in a Wrap Fee Program.

Client Assets

Seamark Financial Services, Inc. monitors client accounts. As of December 31, 2022, the Firm's assets totaled \$89,644,588. All assets are managed on a discretionary basis.

Item 5: Fees and Compensation

Compensation

Seamark Financial Services, Inc. charges our Wealth Management clients an annual fee for investment advisory services and financial planning services based on a percentage of assets under management (see schedule below).

Wealth Management Fees

Assets Under Management	Annual Fee
Up to \$499,999	0.750%
\$500,000 - \$999,999	0.500%
\$1,000,000 - \$4,999,999	0.375%
\$5,000,000 and up	0.250%
Minimum Fee	\$6,000 (\$1,500 quarterly)

Fees for clients who receive only investment advisory services are negotiated on an individual basis.

Clients will be invoiced in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. Fees may be debited from the account in accordance with the client authorization in the Wealth Management Agreement or be invoiced and paid directly by the client. Existing clients may have been grandfathered in from a lower fee schedule.

Financial Planning Fees

Financial planning fees, when negotiated separately, are priced according to the degree of complexity associated with the client's situation and charged at a rate of \$200 per hour. All financial planning and consulting fees are due in arrears, upon presentation of the financial plan or consulting engagement for the client.

Agreement Terms

A client may terminate the Wealth Management Agreement at any time by notifying Seamark Financial Services, Inc. in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Client's do not pay fees in advance therefore are not due a refund.

Seamark Financial Services, Inc. may terminate the client agreement at any time by notifying the client in writing. Clients do not pay fees in advance therefore are not due a refund.

Cash Balances

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

Retirement Plan Rollover Recommendations

As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

If the client elects to roll the assets to an IRA that is subject to our advisement, we will charge the client an asset-based fee as set forth in the advisory agreement the client executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients'.

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' when making recommendations (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to

the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

- 1. leaving the funds in the employer's (former employer's) plan;
- moving the funds to a new employer's retirement plan;
- 3. cashing out and taking a taxable distribution from the plan; or
- 4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with a written explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

General Information on Compensation and Other Fees

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

Seamark Financial Services, Inc. in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.)

Seamark Financial Services, Inc. fees are exclusive of transaction fees and other related costs and expenses which shall be incurred by the client. Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Other Compensation

Neither Seamark Financial Services, Inc. nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither Seamark Financial Services, Inc. nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Seamark Financial Services, Inc. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

Seamark Financial Services, Inc. is an investment adviser providing advice to individuals, high net worth individuals, trusts, and estates.

Account Minimums

Seamark Financial Services, Inc. requires a minimum account of \$2,000,000 for investment advisory clients, although this may be negotiable under certain circumstances. Seamark Financial Services, Inc. may group certain related client accounts for the purposes of achieving the minimum account size.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

In choosing the investment vehicles that it recommends to clients, Seamark Financial Services, Inc. uses the following main sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, information from investment managers, financial service companies, data base companies, financial journals, and government sources.

Using the data obtained from these sources, Seamark Financial Services, Inc. analyzes a specific investment vehicle's performance over time compared to vehicles of a similar nature (e.g., a Large Cap Growth Fund vs. the universe of that type of fund) and/or an index representing that specific investment style. Particular attention is paid to the risk taken (as measured by Standard Deviation) to achieve the reported historical results and that level of risk is compared to averages for the universe in that asset class.

Investment Strategies

Seamark Financial Services, Inc. uses asset allocation, or spreading investments among a number of asset classes and sectors (domestic stocks vs. foreign stocks; large cap stocks vs. small cap stocks; corporate bonds vs. government securities) for most client accounts. Mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; management style and philosophy; and management fee structure.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- Inflation Risk: When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk**: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk**: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk**: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Cybersecurity Risk: A breach in cyber security refers to both intentional and
 unintentional events that may cause an account to lose proprietary information,
 suffer data corruption, or lose operational capacity. This in turn could cause an
 account to incur regulatory penalties, reputational damage, and additional
 compliance costs associated with corrective measures, and/or financial loss.
- Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Seamark Financial Services, Inc. or the integrity of Seamark Financial Services, Inc. management. Neither Seamark Financial Services, Inc., nor its management persons have <u>ever</u> been involved in a legal or disciplinary event requiring disclosure.

Clients may obtain disciplinary history of Seamark Financial Services, Inc., or its representatives from the Massachusetts Securities Division upon request.

For Massachusetts Residents: Massachusetts law requires disclosure that information on disciplinary history and the registration of Seamark Financial Services, Inc. and its associated persons may be obtained by contacting the Public Reference Branch of the Securities and Exchange Commission at (202) 942-8090. Disciplinary history may also be obtained from the Massachusetts Securities Division at (617) 727-3548, and if asked, Seamark Financial Services, Inc. and its associated persons must also disclose the history. No disciplinary history exists for Seamark Financial Services, Inc. and/or its owners or employees.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

Seamark Financial Services, Inc. is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither Seamark Financial Services, Inc. nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Affiliations - Other

Neither Seamark Financial Services, Inc. nor any of its management persons have a material relationship or arrangement with any related person or financial industry entities.

Other Investment Advisors

Seamark Financial Services, Inc. does not recommend or select other investment advisors for its clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Seamark Financial Services, Inc. employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Lynne T. Nahigyan, Vice President and Chief Compliance Officer, reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of Seamark Financial Services Inc. receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Seamark Financial Services, Inc. employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Seamark Financial Services, Inc. Code of Ethics by contacting Lynne T. Nahigyan at (508) 758-6159.

Participation or Interest in Client Transactions

Seamark Financial Services, Inc. and its employees may buy or sell securities that are also held by clients. Employees comply with the provisions of Seamark Financial Services, Inc.'s Code of Ethics.

Neither Seamark Financial Services, Inc. nor its employees recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

It is Seamark Financial Services, Inc.'s policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. Seamark Financial Services, Inc. will also not cross trades between client accounts.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

Seamark Financial Services, Inc. does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions.

Brokerage for Client Referrals

Seamark Financial Services, Inc. does not receive client referrals from broker/dealers.

Directed Brokerage

Seamark Financial Services, Inc. shall generally recommend that portfolio management clients establish brokerage accounts with Charles Schwab & Co., Inc. (hereinafter "Schwab"), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

Seamark Financial Services, Inc. is independently owned and operated and not affiliated with Schwab. Schwab provides Seamark Financial Services, Inc. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis and are not otherwise contingent upon Seamark Financial Services, Inc. committing to Schwab any specific amount of business (assets in custody or trading).

For Seamark Financial Services, Inc. client accounts maintained there, Schwab is compensated through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. The brokerage commissions and/or transaction fees charged by Schwab or any other designated broker-dealer are exclusive of and in addition to Seamark Financial Services, Inc. fees.

Seamark Financial Services, Inc. may receive from Schwab, at no cost to Seamark Financial Services, Inc., professional services, computer software and related systems support, enabling Seamark Financial Services, Inc. to better monitor client accounts maintained at Schwab. Seamark Financial Services, Inc. may receive this support without cost because of the portfolio management services rendered to clients that maintain assets at Schwab. The support provided may benefit Seamark Financial Services, Inc., but not its clients directly. In fulfilling its duties to its clients, Seamark Financial Services, Inc. endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Seamark Financial Services, Inc. receipt of economic benefits from a broker-dealer may create a conflict of interest since these benefits may influence Seamark Financial Services, Inc. choice of broker-dealer over another broker-dealer that does not furnish similar services, software and systems support.

Schwab Institutional also offers other services intended to help Seamark Financial Services, Inc. manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and

business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Seamark Financial Services, Inc. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Seamark Financial Services, Inc. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of Seamark Financial Services, Inc. personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, Seamark Financial Services, Inc. may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. The commissions paid by Seamark Financial Services, Inc. clients shall comply with Seamark Financial Services, Inc. duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Seamark Financial Services, Inc. determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Seamark Financial Services, Inc. will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Trade Aggregation

Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity. Seamark Financial Services does not aggregate or block trades. As a result, clients purchasing securities around the same time may receive a less favorable price than other clients. In addition, not aggregating trades may result in higher transaction costs, as a client will not benefit from lower transaction cost which might be achieved if the trade was aggregated.

Item 13: Review of Accounts

Reviews

Semi-Annual Review of "Portfolio Construction Guidelines"

Semi-annually Seamark Financial Services, Inc. conducts a major review of its recommendations for allocation to individual asset classes, and also of the individual investment vehicles we recommend to fill those allocations and develops overall "Portfolio Construction Guidelines." R. William Blasdale, President, and Lynne T. Nahigyan, Vice President and Chief Compliance Officer, conduct all reviews.

As an integral part of the semi-annual review process, Seamark Financial Services, Inc. conducts a review of the individual investment vehicles (e.g., mutual funds or ETF's) recommended to implement the Guidelines. In the case of an existing vehicle, Seamark reviews risk-adjusted performance over time, continuity of management, investment philosophy and operating expenses. Should we find a reason to recommend a change, we conduct an extensive research process to locate a suitable replacement vehicle. Topics for analysis include, but are not limited to: risk-adjusted performance over time, manager tenure, investment philosophy and process, and operating expense costs.

The allocation guidelines, combined with recommendation for individual vehicles to employ in each asset class and the percentage of each, are then combined to complete the "Portfolio Allocation Guidelines" document. The Guidelines then serve as a master template for portfolio construction until the next semi-annual revision.

Implementation at the Client Level

Once the Guidelines are in place, principals of the Firm meet with individual clients to review the Master Portfolio Allocation and subsequent Portfolio Re-Balancing. Each client meeting starts with a review of the Allocation, where we work with the client to re-affirm or change the basic allocation to Cash, Fixed Income, Equities, and Alternatives. Once that determination has been made, the "Master Allocation Worksheet" is used to calculate the percentage allocation to each of the individual asset classes.

These percentage allocations are then transferred to the "Portfolio Re-Balancing Worksheet," and the allocations to each of the individual asset class as specified in the Guidelines are incorporated. The end result is a specific list of purchases and/or sale recommendations, which the client will then endorse and/or modify. If modifications are made, an updated "Portfolio Re-Balancing" sheet will be generated that reflects the specific purchases and/or sales to be made.

All reviews are documented in Seamark Financial Services, Inc.'s Contact Management system.

Review Triggers

Conditions that may trigger an other than semi-annual review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Reporting

Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, accrued income, dividends, and performance. In addition, the custodian provides clients with trade confirmations for each position bought and sold.

Seamark Financial Services, Inc. also provides clients with a quarterly report including an account appraisal that identifies the current positions as of the reporting date. A performance summary is also provided for the portfolio on a semi-annual basis.

Financial Planning - Reviews and Reporting

The initial financial plan is included as a component of the Wealth Management service. Clients will receive updates to their financial plans on an ongoing basis.

Item 14: Client Referrals and Other Compensation

Other Compensation

Seamark Financial Services, Inc. does not receive any formal economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

<u>Compensation – Client Referrals</u>

Seamark Financial Services, Inc. does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

<u>Custody – Fee Debiting</u>

Clients may authorize Seamark Financial Services, Inc. (in the client agreement) to debit fees directly from the client's account at the broker dealer (custodian). Client investment assets will be held with a custodian agreed upon by the client and Seamark Financial Services, Inc. The custodian is advised in writing of the limitation of Seamark Financial Services, Inc. access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Seamark Financial Services, Inc.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer (custodian) that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that Seamark Financial Services, Inc. provides. Seamark Financial Services, Inc. statements may vary from custodial statements based on accounting procedures or reporting dates.

Item 16: Investment Discretion

Through the Wealth Management agreement, Seamark Financial Services, Inc. may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows Seamark Financial Services, Inc. to execute trades on behalf of clients. Seamark will, however, make every reasonable effort to contact client prior to each trade to obtain approval.

Item 17: Voting Client Securities

Seamark Financial Services, Inc. does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies; clients receive these proxies directly from either custodians or transfer agents.

If requested, Seamark Financial Services, Inc. may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Lynne T. Nahigyan at (508) 758-6159 for information about proxy voting.

Item 18: Financial Information

Seamark Financial Services, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Seamark Financial Services, Inc. is not required to provide a balance sheet; Seamark Financial Services, Inc. does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client, <u>and</u> more than six months in advance.

Item 19: Requirements for State Registered Advisors

Management Background

See response to Form ADV Part 2B - Investment Adviser Brochure Supplement.

Other Business

See response to Item 10 – Other Financial Industry Activities and Affiliations.

Performance-Based Fees

Neither Seamark Financial Services, Inc. nor any supervised persons are compensated by performance-based fees.

Disciplinary Disclosures

Neither Seamark Financial Services, Inc. nor any management persons have ever been involved in any activities resulting in a disciplinary disclosure.

Issuer of Securities

Neither Seamark Financial Services, Inc. nor any management persons have any relationships or arrangements with any issuer of securities.

Seamark Financial Services, Inc. Form ADV Part 2B Investment Adviser Brochure Supplement

109 Fairhaven Road, Suite F Mattapoisett, MA 02739 (508) 758-6159 www.seamarkfinancial.com

Supervisor's Name: R. William Blasdale

Supervisor of: Lynne T. Nahigyan

March 2023

This Brochure Supplement provides information about the Firm's ("we", "us", "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Lynne T. Nahigyan, Vice President and Chief Compliance Officer at (508) 758-6159 or lynne@seamarkfinancial.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

Education and Business Background

Seamark Financial Services, Inc. requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Supervised Persons

R. William Blasdale Born 1943

CRD #4771558

Business Background:

Seamark Financial Services, Inc. 1997 to Present

President

Formal Education after High School:

Princeton University Bachelor of Arts in History

Boston University
Diploma in Financial Planning

Professional Designations:

Certified Financial Planner (CFP®)

Lynne T. Nahigyan Born 1956

CRD #4771565

Business Background:

Seamark Financial Services, Inc. 1997 to Present

Vice President and Chief Compliance Officer

Formal Education after High School:

Southeastern Massachusetts University Bachelor of Arts in Sociology

College for Financial Planning Diploma in Financial Planning

Professional Designations:

Certified Financial Planner (CFP®)

Professional Certifications

Our Supervised Persons maintain professional designations, which required the following minimum requirements:

Certified Financial Planner™ (CFP®)

Issued By	Certified Financial Planner Board of Standards, Inc.
	Candidate must meet the following requirements:
Prerequisites	 A bachelor's degree (or higher) from an accredited college or university, and 3 years of full-time personal financial planning experience
Education Requirements	Candidate must complete a CFP®-board registered program, or hold one of the following: CPA ChFC Chartered Life Underwriter (CLU) CFA Ph.D. in business or economics Doctor of Business Administration Attorney's License
Exam Type	CFP® Certification Examination
Continuing Education Requirements	30 hours every 2 years

Item 3: Disciplinary Information

Neither Seamark Financial Services, Inc. nor any Supervised Persons have ever been involved in any activities resulting in a disciplinary disclosure.

As disclosed in Form ADV Part 2A – Item 9, clients may obtain disciplinary history of Seamark Financial Services, Inc., or its representatives from the Massachusetts Securities Division upon request.

Item 4: Other Business Activities

Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Other Fees

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither Seamark Financial Services, Inc. nor any Supervised Persons receive commissions, bonuses or other compensation (other than as described in Item 12) based on the sale of securities or other investment products.

Item 5: Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Item 6: Supervision

R. William Blasdale, President, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. R. William Blasdale supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, R. William Blasdale regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. R. William Blasdale may be reached at (508) 758-6159.

Item 7: Requirements for State Registered Advisers

Neither Seamark Financial Services, Inc. nor any management persons have ever been involved in any activities resulting in a disciplinary disclosure.

No Supervised Person has been the subject of a bankruptcy petition.